

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

Dominic Ali,
Plaintiff

v.

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* 12-cv-00364-SM
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Warden Edward Reilly, Northern NH
Correctional Facility, Chaplain Dana Hoyt,
Scott Watson, John Masse, Shanon Berwick
Defendants

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AFFIDAVIT OF JOSEPH PELLETIER

I, Joseph Pelletier, upon oath do hereby depose and state as follows:

1. I am currently employed by the New Hampshire Department of Corrections (DOC) as Chef Supervisor I at the Northern New Hampshire Correctional Facility (NCF). I have been employed by DOC for nearly 20 years and have served as Chef Supervisor I for approximately 12 years. I make this affidavit on my personal knowledge.

2. Part of my duties in my position as Chef Supervisor I is to oversee and manage kitchen staff and meal preparation/service at NCF. I am responsible for managing all aspects of meal preparation on a day-to-day basis.

3. For Ramadan 2012, the fasting inmates received three meals per day that were provided to them each evening. The meals consisted of two bagged meals, which were breakfast and lunch, and one hot cell feed that consisted of the same meal the non-fasting inmates received that night.

4. The bagged breakfast consisted of a coffee cake or muffin, cold cereal, a juice packet and two pints of milk. The lunch consisted of four slices of bread, a five ounce non-pork

sandwich meat, two slices of cheese, one packet of crackers/chips, condiments, and a pint of milk.

5. The dinner meal or “hot meal” consisted of whatever meal was served to non-fasting inmates that night and was also the same quantity of food. The fasting inmates would receive this dinner meal as a cell feed that they could eat whenever they wished, which according to Ramadan practice would be after sunset and before sunrise. The 2012 Ramadan Schedule attached to Chaplain Hoyt’s Affidavit states that “supper” will also be a bagged meal. Although this was originally the menu, I had conversations with several fasting inmates who stated that they would rather receive the same dinner meal as the other inmates and wait to eat it until after dark. I accommodated these inmates’ requests and served them the same dinner meal as the non-fasting inmates.

6. With their meal, the fasting inmates received ice that they could use to keep their lunch and breakfast items cold. The fasting inmates were not served any frozen items or any items called “birdseed” or rocks. The Ramadan meals comply with the same nutritional mandates as all other prison meals as established in PPD 8.10 attached as Exhibit E-1.

7. To the best of my knowledge I did not receive any inmate complaints about the quality or quantity of Ramadan feeds served during the Ramadan 2012 fasting period. I declare that the foregoing is true and correct under penalty of perjury.

Dated: August 13, 2013

s/Joseph Pelletier
Joseph Pelletier